

SAF (USA) CORPORATION



CERTIFIED MAIL NO. 7000 0600 0026 5619 0961 Return Receipt Requested

July 24, 2001

Director of Compliance and Enforcement Bay Area Air Quality Management District 939 Ellis Street San Francisco, CA 94109 ATTN: Title V Reports

RE: Major Facility Review Permit.

Annual Compliance Certification Report, 7/1/00 - 6/30/01

Facility #A3523 Facility #B2975
Red Star Yeast
A division of Universal Foods Corp. Lesaffre Yeast O

A division of Universal Foods Corp.

Lesaffre Yeast Corporation
1384 Fifth Street
1384 Fifth Street

Oakland, CA 94607 Oakland, CA 94607

Dear Sir or Madam

As reported to Mr. Victor Morales-Laimon of the Bay Area Air Quality Management District on February 26, 2001 (see enclosed), operational responsibility for the Red Star Yeast facility in Oakland, CA changed from Universal Foods Corporation to Lesaffre Yeast Corporation on February 23, 2001. The District then changed the facility identification number from A3523 to B2975. The enclosed Compliance Certification Report that is required by Condition I.G. of the Major Facility Review Permit covers the entire period 7/1/00 through 6/30/01 during which both Universal Foods Corporation (now Sensient Technologies Corporation) and Lesaffre Yeast Corporation had operational responsibilities. Please note that my signature appears at the bottom of this report because I was the Responsible Corporate Official for the facility under its operation by Universal Foods Corp. and I remain the Responsible Corporate Official for the facility under its operation by Lesaffre Yeast Corporation.

Please note the following comments for the Compliance Certification Report:

Source S-4/Yeast Fermenter #2: Condition #12754, Part 03 of the MFR Permit requires that the VOC monitoring instrument be calibrated once each week and that the calibration must be recorded. The instrument was calibrated on 12/8/00 and again on 12/22/00 and proper logs kept. The instrument was being serviced on 12/15/00 and no record of calibration was made. During discussions with the instrument technician, he indicated that he calibrates each instrument prior to it being re-installed in the monitoring system but that he does not record this calibration. Nonetheless, Red Star interprets the "once each week" requirement to be satisfied by the 12/8/00 calibration (which covered the period 12/1/00 through 12/15/00) and the 12/22/00 calibration

RE: Annual Compliance Certification Report, Facility #B2975 July 24, 2001 Page 2 of 2

(which covered the period 12/15/00 through 12/29/00). As such, Red Star indicated continuous compliance on the Compliance Certification Report.

Source: Facility: Regulation 2-1-429 requires that a Federal Emissions Statement ("FES") be submitted to the District each year with the annual permit renewal. Until we received the 2001 Compliance Certification Report form, Red Star was unaware of this requirement. Regulation 2-1-429 is not listed as an applicable requirement in Red Star's Major Facility Review Permit. However, during discussions with Mr. Brenda Cabral of the District, Red Star learned that Regulation 2-1-429 is Generally Applicable to the Red Star facility. Upon learning of this requirement, Red Star immediately prepared and submitted the FES that would have been enclosed with the 2000 Annual Permit Renewal. The District received the 2000 Annual Permit Renewal on 9/14/00 and the FES on 7/16/01. On the Compliance Certification Report, Red Star noted that it is currently in compliance but that it was out of compliance for 305 days (i.e. 9/14/00 to 7/16/01). Red Star noted "NA" under the "Continuous or Intermittent" column since we believe that this classification applies more to compliance with emission limits instead of reporting requirements.

If you have any questions, please don't hesitate to contact Mr. Alan Bahl, Regional EHS Engineer, at (410) 298-5004.

William Tesch

Vice President, Operations Lesaffre Yeast Corporation

Winn, Jeach

Enc.

Director of the Air Division (Certified Mail No. 7099 3400 0012 2007 4123, Return Receipt Requested)

USEPA, Region IX 75 Hawthorne Street San Francisco, CA 94105

Attention: Air-3

15-Jun-01

Site#: B2975

Sitename: SAF (USA) Corp. (Red Star)

Address: 1384 Fifth Street

City: Oakland

State: CA

Zip: 94607

Source#: 001

Sourcename: Boiler #1

Citation ID	Title	Compliance	Cont or Int	Days Out of Compliance / Comments
09-01-301	Limitations on Ground Level Concentrations	Y	С	
09-01-302	General Emission Limitations	Y	С	
09-01-304	Fuel Burning (Liquid and Solid Fuels)	NA		No fuel oil combusted during period.
09-07-304.02	Tuning requirement	Y	С	
09-07-305.01	Natural Gas Curtailment-Non- Gaseous Fuel: NOx limit	NA		No fuel oil combusted during period.
09-07-305.02	Natural Gas Curtailment-Non- Gaseous Fuel: CO limit	NA		No fuel oil combusted during period.
09-07-306.01	Emission Limits-NOx	NA		No fuel oil combusted during period.
09-07-306.02	Emission Limits-CO	NA		No fuel oil combusted during period.
09-07-306.03	Time limit	NA		No fuel oil combusted during period.
09-07-502	Modified Maximum Heat Input	· NA		Not modified.
09-07-503.01	304.2 Records	Y	С	
09-07-503.02	Records of natural gas curtailment	NA		No natural gas curtailments during period

15-Jun-01

09-07-503.03	Records of equipment testing	NA		No equipment testing on fuel oil.
09-07-503.04	Source test records	NA		No source test on fuel oil.
09-07-603	Compliance Determinations	NA		No source test on fuel oil.
09-07-604	Tune-Up Procedures	Y	С	
Cond# 01993, part 01	Fuel oil #2 sulfur concentration	NA		No fuel oil burned during period.
Cond# 01993, part 02	Fuel oil #2 firing situational limit	NA		No fuel oil burned during period.
Cond# 01993, part 03	Sulfur content certification or lab analysis	NA		No fuel oil burned during period.
Cond# 01993, part 04	Records of fuel use and sulfur content records	NA		No fuel oil burned during period.
SIP 09-01-301	Limitations on Ground Level Concentrations (to 6/8/99)	Y	С	

15-Jun-01

Site#: B2975

Sitename: SAF (USA) Corp. (Red Star)

Address: 1384 Fifth Street

City: Oakland

State: CA

Zip: 94607

Source#: 002

Sourcename: Boiler #2

Citation ID	Title	Compliance	Cont or Int	Days Out of Compliance / Comments
09-01-301	Limitations on Ground Level Concentrations	Y	С	
09-01-302	General Emission Limitations	Y	С	
09-01-304	Fuel Burning (Liquid and Solid Fuels)	NA		No fuel oil combusted during period.
09-07-304.02	Tuning requirement	Y	С	
09-07-305.01	Natural Gas Curtailment-Non- Gaseous Fuel: NOx limit	NA		No fuel oil combusted during period.
09-07-305.02	Natural Gas Curtailment-Non- Gaseous Fuel: CO limit	NA		No fuel oil combusted during period.
09-07-306.01	Emission Limits-NOx	. NA		No fuel oil combusted during period.
09-07-306.02	Emission Limits-CO	NA		No fuel oil combusted during period.
09-07-306.03	Time limit	NA		No fuel oil combusted during period.
09-07-502	Modified Maximum Heat Input	NA		No fuel oil combusted during period.
09-07-503.01	304.2 Records	Y	С	
09-07-503.02	Records of natural gas curtailment	NA		No natural gas curtailments during period

15-Jun-01

09-07-503.03	Records of equipment testing	NA		No equipment testing on fuel oil.
09-07-503.04	Source test records	NA		No source test on fuel oil.
09-07-603	Compliance Determinations	NA		No source test on fuel oil.
09-07-604	Tune-Up Procedures	Y	С	
Cond# 01993, part 01	Fuel oil #2 sulfur concentration	NA		No fuel oil burned during period.
Cond# 01993, part 02	Fuel oil #2 firing situational limit	· NA		No fuel oil burned during period.
Cond# 01993, part 03	Sulfur content certification or lab analysis	NA		No fuel oil burned during period.
Cond# 01993, part 04	Records of fuel use and sulfur content records	NA		No fuel oil burned during period.
SIP 09-01-301	Limitations on Ground Level Concentrations (to 6/8/99)	Y	С	

15-Jun-01

Site#: B2975

Sitename: SAF (USA) Corp. (Red Star)

Address: 1384 Fifth Street

City: Oakland

State: CA

Zip: 94607

Source#: 003

Citation ID	Title	Compliance	Cont or Int	Days Out of Compliance / Comments
08-02-111	Exemption - Food Preparation	Y	С	
Cond# 12754, part 01	Fermenter gas carbon concentration limits	Y	С	
	Fermenter off-property odor correction or contro	NA		No odor nuisance determined.
Cond# 12754, part 03	Records	Y	С	
	Fermenter exhaust gas carbon concentrations	Y	С	
<u> </u>	Yeast production data and measurements	Y	С	
Cond# 12754, part 03c	Monitor weekly calibration requirement	Y	С	

15-Jun-01

Site#: B2975

Sitename: SAF (USA) Corp. (Red Star)

Address: 1384 Fifth Street

City: Oakland

State: CA

Zip: 94607

Source#: 004

Citation ID	Title	Compliance	Cont or Int	Days Out of Compliance / Comments
08-02-111	Exemption - Food Preparation	Y	С	
Cond# 12754, part 01	Fermenter gas carbon concentration limits	Y	С	
Cond# 12754, part 02	Fermenter off-property odor correction or contro	NA		No odor nuisance determined.
Cond# 12754, part 03	Records	Y	С	See cover letter for discussion.
Cond# 12754, part 03a	Fermenter exhaust gas carbon concentrations	Y	С	Section 1
Cond# 12754, part 03b	Yeast production data and measurements	Y	С	
Cond# 12754, part 03c	Monitor weekly calibration requirement			

15-Jun-01

Site#: B2975

Sitename: SAF (USA) Corp. (Red Star)

Address: 1384 Fifth Street

City: Oakland

State: CA

Zip: 94607

Source#: 005

Citation ID	Title	Compliance	Cont or Int	Days Out of Compliance / Comments
08-02-111	Exemption - Food Preparation	Y	I	1 day, 8/24/00, Breakdown #02X40
Cond# 12754, part 01	Fermenter gas carbon concentration limits	Y	I	1 day, 8/24/00, Breakdown #02X40
	Fermenter off-property odor correction or contro	NA		No odor nuisance determined.
Cond# 12754, part 03	Records	Y	С	
•	Fermenter exhaust gas carbon concentrations	Y	С	
Cond# 12754, part 03b	Yeast production data and measurements	Y	С	
Cond# 12754, part 03c	Monitor weekly calibration requirement	Y	С	2005

15-Jun-01

Site#: B2975

Sitename: SAF (USA) Corp. (Red Star)

Address: 1384 Fifth Street

City: Oakland

State: CA

Zip: 94607

Source#: 006

Citation ID	Title	Compliance	Cont or Int	Days Out of Compliance / Comments
08-02-111	Exemption - Food Preparation	Y	С	
	Fermenter gas carbon concentration limits	Y	С	
	Fermenter off-property odor correction or contro	NA		No odor nuisance determined.
Cond# 12754, part 03	Records	Y	С	
-	Fermenter exhaust gas carbon concentrations	Y	С	
	Yeast production data and measurements	Y	С	
Cond# 12754, part 030	Monitor weekly calibration requirement	Y	С	

15-Jun-01

Site#: B2975

Sitename: SAF (USA) Corp. (Red Star)

Address: 1384 Fifth Street

City: Oakland

State: CA

Zip: 94607

Source#: 007

Citation ID	Title	Compliance	Cont or Int	Days Out of Compliance / Comments
08-02-111	Exemption - Food Preparation	Y	С	
	Fermenter gas carbon concentration limits	Y	С	
	Fermenter off-property odor correction or contro	NA		No odor nuisance determined.
Cond# 12754, part 03	Records	Y	С	
	Fermenter exhaust gas carbon concentrations	Y	С	
	Yeast production data and measurements	Y.	С	
Cond# 12754, part 03c	Monitor weekly calibration requirement	Y	С	- Special Spec

15-Jun-01

Site#: B2975

Sitename: SAF (USA) Corp. (Red Star)

Address: 1384 Fifth Street

City: Oakland

State: CA

Source#: Facility

Zip: 94607

Facility
Sourcename:
#: racility

Citation ID	Title	Compliance	Cont or int	Days Out of Compliance / Comments	
02-01-429	Federal Emissions Statement	Ā	NA	305 days out of compliance - see cover letter	etter
40 CFR 068	Accidental Release	NA		nt at great	
Regulation 01	General Provisions and Definitions	Y	0	threshold amounts.	
Regulation 04	Air Pollution Episode Plan	Ÿ	0		
Regulation 05	Open Burning	NA		No open burning conducted.	
Regulation 06	Particulate Matter and Visible Emissions	Y	0		
Regulation 07	Odorous Substances	NA		No odor nuisance determined	
Regulation 08, Rule 01 Organic Compounds Provisions	Organic Compounds - General Provisions	Ÿ	υ		
Regulation 08, Rule 02 Org. Compounds - Mi Operations	Org. Compounds - Misc. Operations	Y	υ		
Regulation 08, Rule 03	Regulation 08, Rule 03 Org. Compounds - Architectural Coatings	X	υ		
Regulation 08, Rule 49	Regulation 08, Rule 49 Org. Compounds - Aerosol Paint Products	Y	U		
Regulation 08, Rule 51	Regulation 08, Rule 51 Org. Compounds - Adhesive and Sealant Products	Y	O		

07

15-Jun-01

Regulation 09, Rule 01	Sulfur Dioxide	Y	С	
Regulation 09, Rule 02	Hydrogen Sulfide	NA		No hydrogen sulfide emissions.
Regulation 11, Rule 02	Asbestos Demolition, Renovation, etc.	NA		No asbestos-containing material projects
Regulation 11, Rule 10	Hexavalent Chrome Emissions from Cooling Towers	Y	С	
Regulation 12, Rule 04	Sandblasting	NA		No applicable sandblasting operations.
SIP Regulation 01	General Provisions and Definitions	Y	C	
SIP Regulation 04	Air Pollution Episode Plan	Y	С	
	Org. Compounds - Aerosol Paint Products	Y	С	
	Sulfur Dioxide	Y	С	
	Sandblasting Standard Condition I, C	NA		No applicable sandblasting operations.
Standard Condition I, C	Fees	Y	С	
Standard Condition I, F	Monitoring reports	Y	С	

Compliance Certification

Based on information and belief formed after reasonable inquiry, the statements and information in the attached Compliance Certification form are true, accurate, and complete.

William Tesch,	Vice	President-Operations
Name of Resp		_

Wieciam Denk
Signature

_____July 1, 2000 to June 30, 2001 Certification Period

7-25-2001

Date

Facility #B2975
Red Star Yeast and Products
Saf (USA) Corporation
1384 Fifth Street
Oakland, CA 94607

Facility #A3523
Red Star Yeast and Products
A division of Universal Foods Corp
1384 Fifth Street
Oakland, CA 94607

CONFIDENTIAL BUSINESS INFORMATION

LeSaffre Yeast Corp/Red Star Yeast & Products 1384 Fifth Street Oakland, CA 94607 Facility #B2975

Source No.	Fermenter No.
S-3	1
S-4	2
S-5	3
S-6	4
S-7	5
Total	

Confidential Business Information Redacted

Trade

Total

1st Generation

Stock

CONFIDENTIAL BUSINESS INFORMATION

FIDENTIAL SS INFORMATION